

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE TREMONT SECURITIES LAW, STATE LAW AND INSURANCE LITIGATION</b>	<b>:</b>	<b>MASTER FILE NO.:</b>
	<b>:</b>	<b>08 CIV. 11117 (TPG)</b>
	<b>:</b>	
	<b>:</b>	
<b>This Document Relates To:</b>	<b>:</b>	
	<b>:</b>	
<b>All Actions</b>	<b>:</b>	
	<b>:</b>	

**SETTLING CLASS PLAINTIFFS' NOTICE OF MOTION FOR FINAL  
APPROVAL OF PARTIAL SETTLEMENT, CLASS CERTIFICATION AND  
DERIVATIVE FINDINGS**

PLEASE TAKE NOTICE that pursuant to this Court's Order Directing Notice and Setting Final Fairness Hearing in Connection With Motion for Approval of Proposed Settlement and Motion for Attorneys' Fees and Expenses, dated April 5, 2011, and upon the accompanying Memorandum of Law in Support of Motion for Final Approval of Partial Settlement, Class Certification and Derivative Findings, declarations and exhibits, Settling Class Plaintiffs will and do hereby move this Court on June 1, 2011 at 2:30 p.m. in the Courtroom of the Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for an order: (i) granting final approval of the proposed partial settlement of the above-captioned consolidated actions (collectively, the "Actions"); (ii) certifying the Settlement Class, described as three subclasses, the State Law Subclass, Securities Subclass and Insurance Subclass and Insurance Subclass, for settlement purposes only, with Settling Class

Plaintiffs as representatives of their respective subclasses and Plaintiffs' Settlement Class Counsel as class counsel for the respective actions in which they currently serve as lead counsel; (iii) determining that the provisions of Rule 23.1, Fed. R. Civ. P., have been satisfied and that the derivative claims have been properly maintained; (iv) determining that the State Law Plaintiffs have standing to prosecute the derivative claims and are adequate representatives pursuant to Rule 23.1; and (v) determining that the form, method and content of notice satisfies due process, the Federal Rules of Civil Procedure, and the Private Securities Litigation Reform Act of 1995.<sup>1</sup>

Dated: May 4, 2011

Respectfully submitted,

**BERNSTEIN LIEBHARD LLP**

Jeffrey M. Haber  
Stephanie M. Beige  
Jeffrey D. Lerner  
10 East 40th Street, 22nd Floor  
New York, NY 10016  
Telephone: (212) 779-1414  
Facsimile: (212) 779-3218

*Lead Counsel for the Securities Actions*

**ENTWISTLE & CAPPUCCI LLP**

By: /s/ Andrew J. Entwistle  
Andrew J. Entwistle  
Robert N. Cappucci  
280 Park Avenue, 26th Floor West  
New York, NY 10017  
(212) 894-7200  
(212) 894-7272 (fax)

**HAGENS BERMAN SOBOL SHAPIRO  
LLP**

Reed R. Kathrein  
Lee Gordon  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
(510) 725-3000  
(510) 725-3001 (fax)

*Co-Lead Counsel for the State Law Actions*

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<sup>1</sup> Except as set forth herein, all capitalized terms used in this notice of motion are to be understood as defined in the Stipulation. (Dkt. No. 392).